

REMARKS

Applicants request reconsideration and allowance of the claims in view of the above amendments and the following remarks. Claims 66, 78 and 90 have been amended. Support for the amendments to the claims may be found throughout the specification and claims as originally filed. No new matter has been added. Claims 1-65, 74, 86 and 98 have been canceled without prejudice or disclaimer. Upon entry of this amendment, claims 66-73, 75-85, 87-97 and 99-101 will be pending in the present application, in which claims 66, 78 and 90 are independent.

Applicants thank Examiner Gyorfí for the courtesies extended to applicants' representative, Sung Kim, during a telephone interview conducted on February 13, 2006. The substance of the interview is incorporated in the remarks below.

The Office Action rejects claims 66-101 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,092,121 to Bennett et al. ("Bennett"). Applicants respectfully traverse this rejection.

Bennett discloses a single dealer management system 12 in communication with a dealer server 11 (see FIG. 1). Bennett teaches that there is a proprietary relationship between the dealer management system 12 and the dealer server 11. For example, Bennett teaches that the relationship between the dealer management system 12 and the dealer server 11 is similar to the interface between a financial institution's back-end automobile loan processing system and an exchange server (see col. 4, lines 1-4). Additionally, Bennett teaches that the dealer server 11 handles the registration of client machines and other third party machines at a specific dealership (see col. 4, lines 12-15). Furthermore, Bennett teaches that the dealer management system 12 is a legacy system (see col. 3, lines 66-67). Therefore, Bennett teaches that the dealer server 11 is configured to operate with the proprietary system of a single vehicle dealer. The dealer server 11 of Bennett is incapable of communicating with a plurality of proprietary systems corresponding to different vehicle dealers. In other words, the dealer server 11 of Bennett is not dealer

agnostic. Therefore, in contrast to amended independent claims 66, 78 and 90 of the present application, Bennett fails to disclose or suggest receiving, with a programmable computer, read data requests, write data requests, and requests to perform operations from a plurality of incompatible applications remote from said programmable computer, said incompatible applications comprising an insurance application, a bank application, a plurality of vehicle dealer applications corresponding to a plurality of different vehicle dealers, and a motor vehicle application. That the incompatible applications comprise a plurality of vehicle dealer applications corresponding to a plurality of different vehicle dealers is supported by the present application. For example, claim 3 as originally filed recites:

The apparatus of claim 1 where the client application is selected from the group comprising: . . . vehicle dealer applications . . .

Additionally, the specification recites:

other client applications 101 are . . . car company applications . . .
(page 6, line 21 – page 7, line 3), and

In one embodiment, various client applications 101, each in a client application domain 102, can all access the data access domain 110 . . . The various client application domains 102 may be scattered in various locations . . . (page 7, lines 18-19).

Accordingly, claims 66, 78 and 90, and their respective dependent claims, are allowable.

Bennett also teaches that the dealer management system 12 originates requests, but fails to disclose or suggest that the dealer management system 12 includes a target database for requests (see FIGS. 1 and 2). The present application allows for communication between different vehicle dealers, in which the vehicle dealers may function as both client applications generating requests, and databases to which requests may be targeted. Therefore, in contrast to amended independent claims 66, 78 and 90 of the present application, Bennett fails to disclose or suggest transmitting, with the programmable computer, received requests to a plurality of incompatible databases remote from said programmable computer, said incompatible databases

comprising an insurance database, a bank database, a plurality of vehicle dealer databases corresponding to a plurality of different vehicle dealers, and a motor vehicle agency database. That the incompatible databases comprise a plurality of vehicle dealer databases corresponding to a plurality of different vehicle dealers is supported by the present application. For example, claim 29 as originally filed recites:

The apparatus of claim 28 where the target database is selected from the group comprising: . . . vehicle dealer applications . . .

Additionally, the specification recites:

Multiple system domains 119 can be accessed by the data access domain 110. Hence, the data access domain 110 can act as a central service center between multiple client application domains 102 and multiple system domains 119. (page 8, lines 12-14).

Accordingly, claims 66, 78 and 90, and their respective dependent claims, are allowable.

Bennett discloses that in the dealer server 11, in response to a user input or event, a request is generated which is handled by an Input/Output API 33 to generate a data buffer, which represents a machine independent data stream. The data buffer is forwarded to a work flow (WF) client API, which creates a WF client object containing the data buffer. The WF client object is then sent to a store and forward transport mechanism, which sends the WF client object to a destination WF server at a remote computer system via the Internet (see column 5, line 53 - column 6, line 30; FIG. 2). The destination WF server converts the received WF client object to a WF server object, which is then input to a map server function that extracts the data buffer. The data buffer is interpreted to invoke an appropriate message handler, and depending on the action taken by the message handler, the data buffer may be modified and used to generate a WF client object containing other data buffers for transmission to the local computer system (see column 6, lines 38-47; FIG. 3).

The Office Action asserts on page 8 that Bennett discloses monitoring all received requests and all data responses to identify any request or response that constitutes an application

trigger and for generating an appropriate application trigger message to activate an appropriate application in response to an application trigger (citing col. 7, lines 15-40). However, Bennett discloses a map server function 55, located within a remote computer system, that extracts a data buffer and then tests whether any interested message handlers 57 at the remote computer system should be invoked (see col. 6, lines 29-53; col. 7, lines 1-30; FIGS. 3 and 4). Bennett discloses that any interested message handlers are executed at the remote computer system, and not at a client application. Therefore, Bennett fails to disclose or suggest generating an appropriate application trigger message to activate an appropriate application among the plurality of incompatible applications in response to an application trigger, as recited by and interpreted within the entire context of amended independent claims 66, 78 and 90. Support for the amendments may be found in claims 74, 86 and 98 as originally filed, as well as in the specification at least at page 13, line 18 – page 14, line 4, and page 15, line 1 – page 16, line 7. Accordingly, claims 66, 78 and 90, and their respective dependent claims, are allowable.

Furthermore, the Office Action asserts on page 6 that Bennett discloses the limitation of generating an audit list of data requests for tracking transactions (citing col. 4, lines 30-50). However, Bennett discloses a permission list contained in the dealer server used to control communication with clients by limiting what actions a user can perform (see col. 4, lines 30-33). The list can be used to create various classes of users, with each class of users having different access restrictions. The permission list is not an audit list, and does not allow tracking of data requests transmitted through the system. Therefore, Bennett fails to disclose or suggest the limitation of generating an audit list of data requests for tracking transactions, as recited in dependent claims 69, 81 and 93. For at least this reason, dependent claims 69, 81 and 93 are allowable.

In view of the above, claims 66-73, 75-85, 87-97 and 99-101 clearly recite elements that are neither disclosed nor suggested by Bennett, or the prior art made of record. Applicants submit that such claims are allowable for at least this reason. Accordingly, applicants request

reconsideration and withdrawal of the rejections.

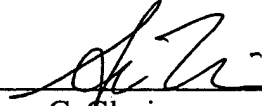
Applicants submit that the present application is in condition for allowance and request favorable action in the form of a Notice of Allowance. Should the Examiner believe that this application is in condition for disposition other than allowance, the Examiner is invited to contact the undersigned at the telephone number listed below in order to address the Examiner's concerns.

Please apply any other necessary charges or credits to Deposit Account No. 50-1721.

Respectfully submitted,

Date: _____

2/15/06

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